



**USS-UPI, LLC  
PRIVACY POLICY FOR CALIFORNIA RESIDENTS**

**Updated: January 1, 2023**

This Privacy Policy provides specific information for residents of California. California laws, including the California Consumer Privacy Act (“CCPA”), require that USS-UPI, LLC, a Delaware limited liability company and its subsidiaries (collectively, USS-UPI, “we,” “us,” or “our”) provide certain information to California residents about how we handle their personal information that we will collect or have collected, whether online or offline. Employees, applicants and former employees are not covered by this policy. Please see the USS-UPI Employee Privacy Policy. <https://www.ussupi.com/wp-content/uploads/2023/01/UPI-Employee-Privacy-Policy.pdf>

**Privacy Notice at Collection:  
Categories of Personal Information that We Collect, Disclose or Sell**

The table below identifies categories of personal information about California residents that we may collect or disclose for a business purpose. USS-UPI does not collect or process sensitive personal information for the purpose of inferring characteristics about the consumer. USS-UPI, does not sell or share the personal information of California residents.

Categories of Personal Information <sup>1</sup>	Collect?	Disclose for business purpose?
<b>Basic Identifiers</b> such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	✓	✓
<b>Cal. Code 1798.80 Information</b> such as signature, physical characteristics or description, telephone number, education, and employment.	✓	✓
<b>Characteristics of protected classifications under California or federal law</b> such as race, color, sex, age, religion, national origin, disability, and citizenship status.	N/A	N/A
<b>Commercial Information</b> such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	N/A	N/A
<b>Biometric information</b> such as fingerprints, retina scans, or facial recognition.	N/A	N/A
<b>Network activity information</b> such as browsing history, search history, and information regarding interaction with an Internet website, application, or advertisement.	✓	N/A
<b>Geolocation data.</b>	N/A	N/A
<b>Sensory Information</b> such as audio, electronic, visual, thermal, olfactory, or similar information.	N/A	N/A
<b>Professional or employment-related information</b> , such as corporate service dates, emergency contact information, and job information.	N/A	N/A

<sup>1</sup> This table does not include information publicly available in government records, de-identified or aggregated California resident information, or information excluded from the CCPA’s scope, such as health or medical information covered by HIPAA or personal information covered by certain other privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Categories of Personal Information <sup>1</sup>	Collect?	Disclose for business purpose?
<b>Education information</b> , defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).	N/A	N/A
<b>Inferential information</b> drawn from any of the information identified above to create a profile about a resident reflecting the resident’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	N/A	N/A

### Sources of Personal Information

We may obtain the categories of personal information described above from the following categories of sources:

- Directly or indirectly from you or your agents. For example, from documents that you provide to us or from forms that you fill out.
- Directly or indirectly from activity at our facilities or on our website ([www.ussupi.com](http://www.ussupi.com)), intranet, USS-UPI provided internet service or on USS-UPI devices. For example, from submissions through our website portal or website usage details collected automatically.

### Uses of Personal Information

We may use or disclose the types of personal information described above for one or more of the following purposes:

- To communicate with you or your company. For example, to provide information about your business account or to provide email alerts and other notices concerning our company, products, or services, or events or news, that may be of interest to you.
- To facilitate transactions. For example, for shipping, delivery, or distribution, or to make or receive payments
- As part of ordinary business processes.
- To improve internal processes. For example, to improve our website or intranet and better present their contents to you.
- For research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of USS-UPI, our employees, customers, or others.
- In cooperation with law enforcement or as required or permitted by applicable law, court order, or regulation.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

Our policy is to retain personal information as required to satisfy business needs and not longer than is reasonably necessary to complete the disclosed purposes for which it was collected.

We will not collect additional categories of personal information or use previously collected personal information for materially different, unrelated, or incompatible purposes without providing you notice, except as required or permitted by law.



## Disclosures of Personal Information

USS-UPI may disclose the personal information described above to various third parties. Such disclosures may be made to service providers or contractors who use the information in compliance with our instructions, to companies and individuals as necessary to facilitate the operation of USS-UPI's business, and to other entities, such as government authorities, as required or permitted by law. For example, USS-UPI may disclose certain personal information as part of due diligence processes, or as necessary to make or receive payments for goods or services provided. USS-UPI seeks to limit disclosures to only the information necessary to fulfil the legal or business purpose for which the information is being disclosed.

## California Resident Rights

California law grants certain rights to California residents and imposes restrictions on particular business practices. California residents have the right to make the following requests:

**Deletion:** The right to request deletion of personal information that we have collected about them, subject to certain exemptions (such as where the information is used by us to detect security incidents or to comply with a legal obligation).

**Correct:** The right to request correction of any inaccurate personal information that we maintain.

**Right to Know:** The right to request that we disclose information about how we have handled their personal information in the prior 12 months (or longer, if requested and certain conditions are met), at no charge, up to twice in a 12-month period, including the:

- Categories of personal information collected;
- Categories of sources of personal information;
- Business and/or commercial purposes for collecting their personal information;
- Specific pieces of personal information collected;
- Categories of third parties to whom we have disclosed their personal information; and
- Categories personal information that we have disclosed for a business purpose.

**Submitting Requests.** A request to exercise California resident rights can be submitted via online webform at <https://www.ussupi.com/ccpa/> or by calling 800-877-7672 (toll free). We will attempt to respond to a California resident's verified request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

**Verification.** We cannot respond to your request or provide you with personal information if we cannot verify your identity and/or your authority to make the request and confirm the relevant personal information relates to you. We will only use personal information provided in a California resident's request to verify the requestor's identity and/or authority to make the request.

**Incentives and Non-Discrimination.** The CCPA prohibits discrimination against California residents (including retaliation against any employee, applicant for employment, or independent contractor) for exercising their rights under the CCPA and imposes requirements on any financial incentives offered to California residents related to their personal information. USS-UPI does not provide any such financial incentives related to the personal information of California residents. USS-UPI also does not discriminate or retaliate against individuals for exercising rights under the CCPA.

## Changes to Our Privacy Policy

We reserve the right to amend this Privacy Policy at our discretion and at any time. To ask questions or comment regarding this Privacy Policy, please contact us at: [legal1@ussupi.com](mailto:legal1@ussupi.com)